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The 2014 best-selling book, "Big Money" by Kenneth Vogel, provided telling new information that could prove very useful in your investigation of my original Federal Election Commission complaint of June 13, 2013. "Big Money," cites more potentially damaging information on Family Leader head Bob Vander Plaats' endorsement of Rick Santorum for President.

BIG MONEY



U.S. Billion Dollars, One Suspicious Vehicle,
and a Pump—on the Trail of the
Ultra-Rich Hijacking American Politics

Kenneth P. Vogel

OFFICE

2013 Jun 13

6:18

According to Mr. Vogel's book, presidential candidate Rick Santorum travelled throughout Iowa with his biggest financial benefactor, billionaire Foster Friess during the weeks leading up to the January 3, 2012 Iowa Caucus. By the time the Iowa Caucus was held, Mr. Friess was the largest donor to both of Mr. Santorum's supposedly independent Super PACs: Red White and Blue Fund and the Leaders for Families PAC.

Mr. Friess contributed a total of \$2.1 million to Red White and Blue Fund and at least another \$50,000 to the Leaders for Families PAC. The Red White and Blue PAC also gave money to the Leaders for Families PAC, making the lines between the two Super PACs supporting Mr. Santorum very blurred. All this occurred while Mr. Friess was at Mr. Santorum's side traveling throughout Iowa while negotiations were taking place between Mr. Santorum, his campaign and Mr. Vander Plaats for Mr. Vander Plaats' coveted endorsement.

Several other Republican presidential candidates were also in negotiations with Mr. Vander Plaats during this period. According to then Texas Governor Rick Perry, the price tag for Mr. Vander Plaats' endorsement was going for up to \$1 million. His endorsement of Mike Huckabee four years earlier helped propel the former Arkansas Governor to victory in the 2008 Iowa Caucus.

Santorum's Iowa Caucus Victory

On January 3, 2012 Rick Santorum shocked the nation by nearly beating frontrunner Mitt Romney in the Iowa Caucus. Up until that point, Mr. Santorum's campaign had been limping along, with little funds, few endorsements and was largely overlooked by the media.

On the evening of January 3, 2012, Mr. Santorum took the stage in Des Moines to give his victory speech, while a distinguished man with silver hair was beaming over his left shoulder. Foster Friess was standing beside to Mr. Santorum's wife, family and campaign staff holding an official Santorum for President sign and cheering. Mr. Friess certainly did not keep the required "arm's length" from Mr. Santorum and his campaign on election night and most likely had not done so during the lead up to the Iowa Caucus.

The Vander Plaats Endorsement

Mr. Vander Plaats endorsed Mr. Santorum on December 20, 2011, just two weeks before the all-important Iowa Caucus. Mr. Santorum was quoted stating that as an apparent condition of the Vander Plaats' endorsement, "he (Mr. Vander Plaats) needed money to promote the endorsement and that would be important to do that."

According to official filings with the Federal Election Commission, Mr. Vander Plaats formed the Leaders for Families PAC the following day on December 21, 2011 to promote that endorsement. The filings showed that the PAC had already spent nearly \$15,000 on behalf of Mr. Santorum on robocalls and the creation of radio ads even though it had not yet received any donations. The Iowa Caucus was less than two weeks away and Mr. Vander Plaats needed to immediately begin spending money to promote Mr. Santorum. Mr. Vander Plaats spent as if he knew the money would come, and within week it did.

Mr. Vander Plaats' endorsement is often cited as the principal reason that Mr. Santorum came within 8 votes of beating Mitt Romney in the Iowa Caucuses. In this first battle of the 2012 presidential campaign, Iowa was a make or break state for Mr. Santorum, but he had no money in his campaign bank account. Santorum's campaign was slightly in debt, so it was impossible that the Rick Santorum for President Campaign was able to pay the up to \$1 million for Mr. Vander Plaats' endorsement.

Foster Friess - Santorum's Angel

Enter Foster Friess, the billionaire businessman, Santorum friend, adviser and apparent member of Mr. Santorum's inner circle. As of December 20, 2011, Mr. Friess was the single largest donor to the Pro-Santorum Red White and Blue Fund. It appears that when the endorsement negotiations were taking place between Mr. Santorum, his Campaign and Mr. Vander Plaats, Mr. Friess was in Iowa traveling with Mr. Santorum and a very likely participant in the endorsement negotiations.

According to "Big Money" (page 85), "Despite a bum knee that would soon require surgery, Friess joined Santorum on the trail and was having the time of his life, vicariously living his own political fantasy camps of sorts through Santorum."

On pages 86 to 87 of "Big Money" it says, "Friess, on the other hand, freely discussed strategy with both the campaign and the Super PAC. He told the latter that he didn't want his cash to be

used on negative ads, instead suggesting he'd like to see ads focusing on Santorum's work against Islamic extremism."

It is highly probable that Mr. Friess, who became a billionaire managing mutual funds, and whom CNBC's Ron Insana dubbed one of the "century's great investors," was smack dab in the middle of the negotiations with Mr. Vander Plaats.

And the Money Starts Rolling In

Two days after the Vander Plaats' endorsement, Mr. Friess donated \$81,000 to the Red White and Blue Fund. \$75,000 of which appears to have then been transferred a few day later to the Leaders for Families PAC. Mr. Friess became the largest donor directly to the Leaders for Families PAC, giving \$50,000 the following week to this brand new Vander Plaats created Super PAC. The new PAC's legal counsel was James Bopp of the Bopp Law Firm of Terre Haute, Indiana. Mr. Bopp also served as the National Organization for Marriage, Inc.'s lead attorney.

Friess told Politico, "Leaders for Families used the cash to air radio and television ads and place automated telephone calls touting the endorsement from Vander Plaats. ... The Vander Plaats endorsement and promotion thereof 'was world changing.'"

It certainly appears that it was Mr. Friess who provided the money for the "world changing" of Mr. Santorum's campaign and greatly helped to propel Mr. Santorum to his narrow victory in Iowa. "Friess did not shy away from the characterization that the \$537,000 spent by the Red White and Blue Fund in Iowa — which dwarfed the \$22,000 spent by the Santorum campaign on ads in the state — helped Santorum finish a close second to Mitt Romney in the state's caucuses."

Did Foster Friess Keep "Arm's Length" from the Santorum Campaign?

While Mr. Santorum's campaign moved on to other primary and caucus states, news reports were circulating on how Mr. Friess was still very closely involved with both the Rick Santorum for President Campaign and the Red White and Blue Fund.

Mr. Friess apparently had great influence on what types of ads the Pro-Santorum Super PAC, Red White and Blue Fund could create and run: "He (Friess) told the operatives running the super PAC that 'any money that I'm connected to, I want the ads to be dignified, and I want them to be honest. I'm fine with contrast ads, but I'm very, very adverse to some of the ads that I think are destructive.'" While many political campaign contributors like to suggest strategy and ad ideas, Mr. Friess would likely have an undue influence because millions of dollars in the Pro-Santorum Super PAC came from him.

Was Mr. Friess an Unpaid Campaign Consultant?

Two different sources described how Mr. Friess helped craft the advertising and media strategy for the Rick Santorum for President Campaign. "Friess has become part of Santorum's campaign inner circle, traveling with the candidate on the trail and participating in sensitive conversations about campaign advertising. Mr. Santorum told reporters during the primary campaign that Friess is "someone who I talk to, who gives me plenty of advice on how I say it and what I say." "Foster Friess, the primary funder for the pro-Santorum Super PAC 'Red White and Blue Fund,' travels with the inner circle of the campaign; he has given suggestions to advisers about media strategy; and on Friday, he will introduce the presidential hopeful at the Conservative Political Action Conference."

It appears that Mr. Friess was advising Mr. Santorum and his campaign staff in other areas as well: "It's clear advice is given. Monday evening, Friess was questioning staff about interviews the candidate was doing and he compliments Santorum on certain lines he thinks are more powerful than others."

Mr. Friess wielded substantial power over the Santorum campaign and the staff would kowtow to his demands: "In front of reporters this week, Friess questioned campaign staffers about why the candidate had not done a local interview he tried pitching them on. 'If you want us to do it, we'll do it,' one aide finally told him."

When Mr. Friess was advising Mr. Santorum and managing campaign staff, they were all aware that Mr. Friess was more than just a friend, but a multi-million dollar donor to the Red White and Blue Super PAC that kept Rick Santorum winning primaries.

Friess and Santorum in Bed Together?

After Iowa it appears that Mr. Friess travelled with Mr. Santorum to several other states including Minnesota, Colorado, Missouri and Washington DC, while he continued to donate large sums to the Red, White and Blue Fund.

- On January 18, 2012 Mr. Friess donated \$253,400 to Red, White and Blue PAC.
- On January 30, 2012 "Friess has been traveling with Santorum for several days. Last Monday in Bemidji, Minn., the 71-year-old bounded around the town with the candidate."
- The very same Monday, Mr. Friess donated \$415,600 to the Red, White and Blue Fund.
- Mr. Friess was an adviser who enjoyed small audiences with Mr. Santorum and his other top level advisers: "At CPAC, Friess was one of only a few advisers with Santorum in the suite during my interview. And he was there from the start."
- Mr. Friess accompanied Mr. Santorum on his campaign plane. Mr. Friess "was again on the plane wearing his signature white cowboy hat, as he told jokes to staff and press."

Ask Mr. Friess

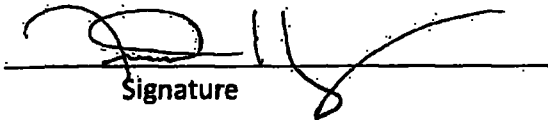
Mr. Friess would be an excellent witness to help determine if my charges of "Pay for Play" from my June 13, 2013 Federal Election Commission complaint were correct.

Questions:

1. Were Mr. Friess and the Rick Santorum for President Campaign coordinating with Mr. Vander Plaats, the National Organization for Marriage and the Super PAC, Leaders for Families PAC and its Political Director Frank Schubert (also NOM's Political Director) to secure Mr. Vander Plaats' endorsement of Mr. Santorum?
2. Did Mr. Friess offer to directly contribute money to Mr. Vander Plaats and / or his organization The Family Leader or the new Leaders for Families PAC in exchange for Mr. Vander Plaats' endorsement of Mr. Santorum?
3. Did Mr. Friess offer to help raise money for Mr. Vander Plaats and / or his organization The Family Leader or the new Leaders for Families PAC in exchange for Mr. Vander Plaats' endorsement of Mr. Santorum?
4. Did Mr. Friess know that his \$81,000 contribution to the Red White and Blue Fund would immediately be transferred into the Leaders for Families PAC to publicize Mr. Vander Plaats' endorsement?
5. When did Mr. Friess first learn about Mr. Vander Plaats' new Super PAC, Leaders for Families PAC, and what were the circumstances that lead to Mr. Friess to becoming its largest donor?
6. Was James Bopp, who established and was the legal counsel for the Leaders for Families PAC, aware of any of the negotiations between Rick Santorum, the Rick Santorum for President Campaign and Mr. Vander Plaats or any of his representatives? Mr. Bopp was the longtime attorney for another one of the Respondents, the National Organization for Marriage, Inc. The Bopp Law Firm is located at 1 South Sixth Street, Terre Haute, Indiana 47807-3510. This is also the address for the Leaders for Families PAC.
7. Were Mr. Friess and Mr. Bopp aware of any of the alleged "Pay for Play" arrangements to secure Mr. Vander Plaats endorsement of Mr. Santorum as detailed in my original FEC complaint (MUR #6749)?
8. Did Mr. Friess coordinate his contributions to the Red White and Blue Fund and the Leaders for Families PAC with either Mr. Santorum or any members of the Santorum for President Campaign or any of its consultants?

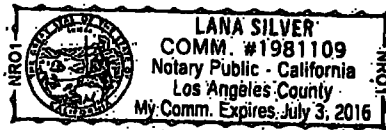
I hope that this additional information will help with your ongoing investigation of my complaint.

Thank you very much.


Signature

4/9/15
Date

Attachments:



Subscribed and sworn to before me on this 9th day of April, 2015



Mr. Friess watching Mr. Santorum during
a campaign stop in Altoona, Iowa on January 2, 2012



Mr. Santorum delivers his Iowa Caucus victory speech while Mr. Friess beams over his shoulder



Mr. Friess is on stage with Mr. Santorum during his February 7, 2012 Missouri Victory Speech



Mr. Friess stands behind Mr. Santorum on election night February 28, 2012 after the Michigan Primary

Browse by Amount: 1 2 3Next

Contrib	Occupation	Date	Amount
DORE, WILLIAM J LAKE CHARLES, LA 70605	DORE ENERGY CORPORATION	01/11/12	\$1,000,000
SIMMONS, ANNETTE DALLAS, TX 75240	CONTRAN CORPORATION	02/15/12	\$1,000,000
FRIESS, FOSTER S JACKSON, WY 83002	INVESTOR	02/21/12	\$600,000
DORE, WILLIAM J LAKE CHARLES, LA 70605	DORE ENERGY CORPORATION	02/14/12	\$500,000
DORE, WILLIAM J LAKE CHARLES, LA 70605	DORE ENERGY CORPORATION	03/26/12	\$500,000
FRIESS, FOSTER S JACKSON, WY 83002	INVESTOR	03/08/12	\$500,000
GORE, SUSAN W CHEYENNE, WY 82009	RETIRED	03/12/12	\$500,000
FRIESS, FOSTER S JACKSON, WY 83002	INVESTOR	01/30/12	\$415,600
FRIESS, FOSTER S JACKSON, WY 83002	INVESTOR	01/18/12	\$253,400
FRIESS, FOSTER S JACKSON, WY 83002	INVESTOR	11/03/11	\$250,000

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

FOR LINE NUMBER: PAGE 6 OF 21

(check only one)

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☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17

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NAME OF COMMITTEE (In Full)

Leaders for Families Super PAC, Inc.

A. Foster Friess Full Name (Last, First, Middle Initial) Mailing Address PO Box 9790 City Jackson State WY Zip Code 83002 FEC ID number of contributing federal political committee. C Name of Employer Self Occupation Investor Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼ Aggregate Year-to-Date ▼ 50000.00			Date of Receipt 12 29 2011 Transaction ID : SA11AI.4189 Amount of Each Receipt this Period 50000.00 wire in
B. Charles Parlato Full Name (Last, First, Middle Initial) Mailing Address 1529 Crestview Ave City Tallahassee State FL Zip Code 32303 FEC ID number of contributing federal political committee. C Name of Employer C&C Shorelands Occupation Developer Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼ Aggregate Year-to-Date ▼ 25000.00			Date of Receipt 12 23 2011 Transaction ID : SA11AI.4183 Amount of Each Receipt this Period 25000.00 wire in
C. Full Name (Last, First, Middle Initial) Mailing Address City State Zip Code FEC ID number of contributing federal political committee. C Name of Employer Occupation Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼ Aggregate Year-to-Date ▼			Date of Receipt 12 23 2011 Amount of Each Receipt this Period
SUBTOTAL of Receipts This Page (optional)..... ▶			75000.00
TOTAL This Period (last page this line number only)..... ▶			75000.00

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for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 7 OF 21

(check only one)

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			<input type="checkbox"/> 17

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NAME OF COMMITTEE (In Full)

Leaders for Families Super PAC, Inc.

Full Name (Last, First, Middle Initial)

A. RED WHITE AND BLUE FUND

Mailing Address PO BOX 26141

City	State	Zip Code
ALEXANDRIA	VA	22313

FEC ID number of contributing federal political committee. **C** C00503417

Name of Employer Occupation

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

50000.00

Date of Receipt

12 27 2011

Transaction ID : SA11C.4187

Amount of Each Receipt this Period

50000.00

wire in

Full Name (Last, First, Middle Initial)

B. RED WHITE AND BLUE FUND

Mailing Address PO BOX 26141

City	State	Zip Code
ALEXANDRIA	VA	22313

FEC ID number of contributing federal political committee. **C** C00503417

Name of Employer Occupation

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

75000.00

Date of Receipt

12 29 2011

Transaction ID : SA11C.4253

Amount of Each Receipt this Period

25000.00

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Full Name (Last, First, Middle Initial)

C.

Mailing Address

City	State	Zip Code
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FEC ID number of contributing federal political committee. **C**

Name of Employer Occupation

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

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POLITICO

3 billionaires who'll drag out the race

By: Kenneth P. Vogel
January 12, 2012 04:42 AM EDT

Meet the three billionaires who could drag out the GOP presidential primary, bloody up front-runner Mitt Romney and weaken the odds of defeating President Barack Obama: Sheldon Adelson, Foster Friess and Jon Huntsman, Sr.

The three men are contributing millions of dollars to a trio of outside groups flooding the airwaves in early voting states with brutal ads attacking Romney and ads backing the candidates they would prefer to win the Republican nomination.

Adelson, a Las Vegas casino mogul, wrote a \$5 million check — and has considered giving much more — to a so-called super PAC backing Newt Gingrich's presidential campaign.

Huntsman, Sr., who made his fortune at the helm of an eponymous chemical and manufacturing company, reportedly invested millions in a super PAC supporting the presidential bid of his son, former Utah Gov. Jon Huntsman, Jr.

And Friess, a Wyoming mutual fund master, acknowledged to POLITICO that he is a major financial backer of a super PAC supporting Rick Santorum called the Red, White and Blue Fund and is preparing to give more, but declined to say how much he has given or plans to give.

Operatives say that without the super PAC air cover funded by these deep-pocketed political patrons and their associates, their favored candidates would have a tough time keeping their bare-bones campaigns going as long as they have — let alone beyond the next couple of contests in South Carolina and Florida.

The prospect that these candidates could carry on is a testament to the new world of campaign money ushered in by a pair of federal court rulings in 2010: A single wealthy donor can now prop up a presidential campaign with unlimited cash, even if the candidate is getting little traction with voters.

"I guess if Newt's got \$5 million, it makes sense that Rick [Santorum] should have a little bit," said Friess, who has known Santorum since the 1990s and shares his conservative views on social and foreign policy issues. He became among the first major donors to the Red, White and Blue Fund because, he said, "I believe that Rick Santorum is the most electable candidate. And I'm just thrilled to be able to have played a role so far."

Friess did not shy away from the characterization that the \$537,000 spent by the Red, White and Blue Fund in Iowa — which dwarfed the \$22,000 spent by Santorum's campaign on ads in the state — helped propel Santorum to a close second to Romney in the state's caucuses. But Friess laughed off a story on the liberal *Daily Kos* headlined "Meet Foster Friess,

Billionaire Who Bought Iowa for Santorum.

"I told my wife 'Wow, I got a bargain,'" he said, noting that the super PACs and campaigns supporting Romney, a former Massachusetts governor, and Texas Gov. Rick Perry spent far more and asserting that such a headline "completely discounts that Rick Santorum went to 381 town halls" in the run-up to the caucuses.

Friess conceded that Santorum lacks a big donor network that can compete with "the cadre of pals like Perry or Romney" has, who have filled the coffers of super PACs backing their respective campaigns.

The propping up of super PACs by Adelson, Friess and Huntsman, Sr., has some establishment Republicans grumbling privately that the men may be hurting the party by setting the stage for a long and damaging primary battle that won't block Romney from winning the nomination but will leave him limping into a general election tilt.

Some have even made veiled threats of retribution, if the men don't back off.

But allies of Gingrich, Santorum and Huntsman dismiss the concerns about a long and damaging primary as self-serving efforts to align big donors behind Romney. And they point to the protracted and bitter 2008 Democratic presidential primary between Hillary Clinton and Barack Obama to prove that such battles can actually help the party.

The idea that a competitive primary should be avoided "goes back forever and it's a specious argument that has no basis in fact," said Rick Tyler, a former Gingrich aide who's now running the Adelson-backed pro-Gingrich super PAC, which is called Winning Our Future.

In fact, Obama's allies have at times seemed to be working in tandem with Romney's Republican foes, particularly the pro-Gingrich super PAC backed by Adelson, which is called Winning Our Future. It's spending millions of dollars in South Carolina airing hard-hitting ads derived from a half-hour documentary that depicts Romney as a cold-hearted vulture for his days heading an investment firm called Bain Capital.

Adelson hasn't seen the documentary or the ads, said a spokesman, who declined to comment Wednesday on the hand-wringing by Republicans worried about the impact of his super PAC giving.

But last month, when he was talking with operatives about opening his checkbook wide to Winning Our Future, Adelson told POLITICO that his political efforts were motivated by his support for Gingrich, rather than antipathy toward any other candidate.

"I'm a guy who practices loyalty," said Adelson, a 78-year-old worth upward of \$20 billion, who's been friendly with Gingrich since the mid-1990s, when the former Georgia congressman was speaker of the House. They've bonded over a shared enmity for labor unions and support for Israel, and Adelson was the biggest donor — giving \$7.7 million — to Gingrich's main political vehicle over the past few years, the now-defunct fundraising juggernaut American Solutions for Winning the Future.

"I wouldn't step away from Gingrich because I think another candidate is the best. I think that Gingrich is the best candidate and he'll make the best president," Adelson said in a telephone interview. "That doesn't mean that the other guys would make lousy presidents, OK? But on a scale of one to 10, I got to make a priority of who I think will make the best

president." If Gingrich doesn't win the nomination, Adelson said, "I would certainly support the Republican candidate. The idea is to avoid another four years of Obama, because this won't be the same country."

While Adelson described himself as "the kind of guy that would prefer to stay under the radar," both Friess and the elder Huntsman have taken more public roles in the campaigns of their beneficiaries.

Friess campaigned with Santorum in the days before the Iowa caucuses, speaking on behalf of the former Pennsylvania senator at a local event, then scoring a prime spot on stage behind the candidate during his triumphant speech after his second-place caucus finish.

A longtime donor to social conservative causes dear to Santorum, Friess and his wife Lynn, both 71, built a \$15.7 billion investment management firm. He told POLITICO that he is putting together a challenge grant to encourage other wealthy donors to give to the Red, White and Blue Fund, which he said received a \$1 million check Wednesday.

The group intends to announce Thursday that it has bought \$600,000 more in ad time in South Carolina, bringing its total buy to about \$800,000 in the state, which is considered fertile ground for Santorum's socially conservative message. The ads — combined with a Santorum campaign buy in the Palmetto State fueled by a post-Iowa fundraising surge — offer a distinctly different feel for a campaign that has scraped to get by.

The Red, White and Blue Fund's ads have been positive, pro-Santorum messages to date, and, though Friess conceded "negative ads are more impactful five to one," he said he's told the operatives running the super PAC that "any money that I'm connected to, I want the ads to be dignified, and I want them to be honest. I'm fine with contrast ads, but I'm very, very adverse to some of the ads that I think are destructive."

Suggesting he was uncomfortable with Winning Our Future's attacks on Romney, he praised Santorum for being "the only competitor who didn't jump on that bandwagon to stomp on Romney."

Jon Huntsman, Sr., has been a presence throughout the campaign of his son, and they appeared most recently together on stage at a Manchester, N.H., restaurant during a Tuesday night party celebrating the son's third-place finish in the Granite State.

Our Destiny PAC, the super PAC supporting Huntsman, aired more than \$2 million worth of ads in New Hampshire supporting Huntsman and ripping Romney. And while Huntsman has declared himself "mighty thankful" for the "air cover," he also has said he and his father do not discuss Our Destiny or campaign strategy — communications prohibited under election rules barring coordination between campaigns and super PACs.

The elder Huntsman "communicates daily with his son" and "continue[s] to be a major contributor" to Our Destiny, said Fred Davis, a veteran GOP adman who is a key adviser to the super PAC.

But the father has "no official role" and "no unofficial role" with the super PAC, Davis said, adding that neither Huntsman, Sr., nor any of the other donors have any input in the PAC's decisions.

"Only the board [has]," he said. The donors are told only "that they are helping the candidacy of Jon Huntsman. They trust the organization and professionals to spend the

money wisely," Davis said.

As for concerns raised like those raised by Sen. John McCain (R-Ariz.) that the flow of unlimited cash to outside groups "will lead to corruption and scandals," both Adelson and Friess said they neither want, nor expect anything in return for their support of Gingrich and Santorum, respectively, though Friess cracked that he might want to be ambassador to Zimbabwe.

But Romney allies and others in the conservative establishment in recent days have suggested that the super PACs supporting Huntsman and Gingrich could be vulnerable to Federal Election Commission complaints alleging violations of the coordination rules.

Friess called the FEC rules "goofy government regulations" but said he's not worried about being targeted by a coordination complaint, explaining he neither knows "what the [Santorum] campaign is doing" nor tells Santorum "what I'm doing or what I'm thinking" about the super PAC. Nor is he worried about scrutiny from Santorum opponents, he said, proclaiming "so far, I'm getting a big kick out of" the attention brought by his donations to the pro-Santorum super PAC.

But Adelson's camp seemed less amused when asked about recent comments by a top Romney surrogate, former New Hampshire Gov. John Sununu, who seemed to signal the possibility of retribution from Romney supporters.

"Does he think people don't remember when you attack them and pay for the attacks in the primary? Especially when one of the parties receiving that attack is the same investment community that he likes to go to to finance his expansions," Sununu railed on Fox News. "There's just no common sense in this process, and you kind of feel sorry for people that aren't that bright."

While Adelson spokesman Ron Reese said his boss is "no more concerned about" heightened scrutiny resulting from his super PAC donations "than he is about having his iced tea in the afternoon," he did take a swipe at Sununu.

"Mr. Adelson is one of the world's leading entrepreneurs and has risen from humble beginnings to become one of the wealthiest people on the planet," said Reese, "so apparently there's still some hope for the 'not so bright'."

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Posted at 06:00 AM ET, 01/04/2012

Perry spent more than \$300 per vote in Iowa; Santorum, only 73 centsBy [Felicia Sonmez](#)

Texas Gov. Rick Perry (R) came in first place in Iowa — when it comes to money spent per vote.

Perry's campaign spent about \$4.5 million on media in Iowa, more than any other candidate. As of early Wednesday morning, he had garnered only 12,442 votes out of more than 121,000 cast.

That means that Perry spent about \$364 per vote.

Former Massachusetts governor Mitt Romney (R), who is in a tight race with former senator Rick Santorum (R-Pa.) for the top spot in Iowa, spent about \$1.47 million on media and won 29,874 votes as of press time. That comes out to about \$49 per vote.

The best value in the race goes to Santorum.

He spent only \$21,980 in Iowa and took 29,908 votes in the caucuses, totaling about 73 cents per vote.

The spending totals, compiled by BuzzFeed, do not include money spent by super PACs on the candidates' behalf.

By [Felicia Sonmez](#) | 06:00 AM ET, 01/04/2012

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POLITICO

Super PACs echo parodies

By: Kenneth P. Vogel
February 13, 2012 05:51 PM EDT

When it comes to super PACs, it's getting hard to tell the difference between reality and a Comedy Central bit.

Stephen Colbert made an ongoing gag last month out of lampooning the rules barring coordination between outside groups and campaigns. When he announced a plan to run for president, he made a big show of handing off his super PAC to his fellow Comedy Central host Jon Stewart. Stewart promised not to coordinate with Colbert — giving the camera a wink and a nod.

But it was no joke last week when President Barack Obama and Mitt Romney cleared their top aides to raise cash for the super PACs supporting their campaign.

Meanwhile, casino mogul Sheldon Adelson, whose family has pumped \$11 million into the super PAC boosting Newt Gingrich's campaign, sat in on a meeting of the campaign's national finance committee at one of his Las Vegas hotels this month. He also met privately with both Gingrich and Romney.

And Rick Santorum took the podium at the Conservative Political Action Conference last weekend after a warm introduction from his friend Foster Friess, a Wyoming multimillionaire who's given hundreds of thousands of dollars to two super PACs credited with Santorum's surge.

Friess has become part of Santorum's campaign inner circle, traveling with the candidate on the trail and participating in sensitive conversations about campaign advertising. Santorum told reporters last week that Friess is "someone who I talk to, who gives me plenty of advice on how I say it and what I say."

The law couldn't be more clear: campaigns aren't supposed to communicate strategy or coordinate spending with their super PAC supporters. And all the candidates claim they're not doing anything wrong — Santorum insists super PACs don't come up in his chats with Friess, and representatives for Gingrich, Romney and Obama all say they're not breaking the rules either.

It looks like they'll get the last laugh, since there's no sign of serious legal or technical challenges to the brazen behavior that might force campaigns or super PACs to reverse course before Election Day.

"It sounds to me as if the current — admittedly inadequate — rules are being bent or broken, especially when persons responsible for [super PAC ads] are also traveling with the candidates and/or advising them," said Trevor Potter, a former Federal Election Commission chairman who was the top lawyer for John McCain's Republican presidential campaigns, which discouraged outside spending groups.

It's a bit of life imitating art for Potter, who has been participating in the ongoing Colbert-Stewart gag on their late-night shows. Colbert's faux pundit character has talked about the "loopchasms" in the coordination restrictions and it's not hard to imagine him devising a scenario like the Friess-Santorum talks.

While the coordination ban has been in effect for years, it's gotten a lot more attention since a pair of 2010 federal court decisions created super PACs, allowing them to take unlimited funds from individuals, corporations and unions. The major limitation, as reinforced in the first decision, *Citizens United vs. FEC*, is that outside group ads "by definition" cannot be "coordinated with a candidate." The FEC in June issued an opinion making clear that election rules don't prohibit candidates or their campaigns from helping super PACs fundraise within pre-existing limits.

And last summer, Romney appeared at multiple fundraisers for the super PAC supporting him, while Sens. Harry Reid and Chuck Schumer and House Speaker John Boehner and Democratic Leader Nancy Pelosi have availed themselves of the FEC decision to boost super PAC fundraising pushes.

Santorum's campaign hasn't discussed dispatching representatives to help its super PAC raise money, said a source familiar with the outside group. And, while Gingrich's campaign is considering assisting the fundraising of a supportive super PAC, it has yet to do so, though the pro-Gingrich group, like the ones boosting Obama and Romney, is run by former close associates of the candidate.

The super PACs are like the "the evil twin of the candidate's campaign committee," FEC vice chairman Ellen Weintraub told POLITICO. "We really do not know whether this is at all what the courts had in mind when they opened the door to independent spending committees with no contribution limits."

Obama had blasted such outside groups as a distortion of democracy and he particularly criticized non-profit groups that – unlike super PACs – do not disclose their donors. So Republicans hit him for hypocrisy last week when he bowed to political reality and cleared his top campaign and administration officials to help raise money for Priorities USA Action, the struggling super PAC set up to boost his campaign.

While it had received \$215,000 from an affiliated non-disclosing non-profit group called Priorities USA, the groups quietly moved on Friday to segregate their finances in an effort to shield Obama from additional criticism. Because of "all the questions that were raised about it, we just wanted to eliminate any sense that there was a co-mingling that made people uncomfortable," Bill Burton, the groups' founder, told POLITICO.

The super PAC is still trying to figure out how it will work with Obama aides to raise money within the rules, Burton said. The super PAC's January fundraising haul – which will be disclosed in a report due next week – will not show the benefits of the Obama blessing and will be "a pretty small number," said Burton, who worked as a top aide to Obama on the 2008 campaign and in the White House.

It's partly ties like Burton's that have watchdogs and rival operatives accusing campaigns and super PACs of flouting the coordination ban. They point out, for instance, that the super PAC supporting Romney is being run in part by a fundraiser who came on board directly from the campaign and a lawyer whose wife continues to work for the campaign.

Likewise, opponents clucked their tongues when Texas Gov. Rick Perry's since-aborted presidential campaign produced an ad using video footage shot by the super PAC and when POLITICO reported that billionaire industrialist Jon Huntsman, Sr., was both communicating

daily with his son's now-defunct presidential campaign and funding the super PAC supporting it.

Perhaps the most extreme cross-pollination between a campaign and a super PAC is the case of Friess, a 71-year old retired mutual fund manager. Through the end of last year, he had donated \$381,000 to a pair of super PACs that buoyed Santorum with ads and robo-calls at a time when his campaign lacked the resources for such important expenditures.

The two men campaigned together nearly around-the-clock in the days before Santorum's victory in January's Iowa caucuses and his sweep of last week's contests in Colorado, Minnesota and Missouri. During Santorum's victory speeches in both instances, Friess stood beaming on stage behind the former Pennsylvania senator. Then on Friday, it was Friess at the podium at the Conservative Political Action Conference in Washington, introducing Santorum as "a dear friend" and "the next president of the United States."

Behind the scenes, Friess has been even more important to Santorum's effort.

Days after influential Iowa conservative leader Bob Vander Plaats gave his coveted endorsement to Santorum in the run-up to his state's caucuses, his organization established Leaders For Families Super PAC, which quickly took in \$125,000 — almost all of its cash — from Friess, and a pro-Santorum super PAC called the Red, White and Blue Fund, for which Friess is the biggest donor.

Leaders For Families used the cash to air radio and television ads and place automated telephone calls touting the endorsement from Vander Plaats, who had reportedly told Santorum he "needed money to promote the endorsement."

The Vander Plaats endorsement and promotion thereof "was world changing," Friess told POLITICO.

And though Friess said he's asked Red, White and Blue Fund not to use his cash on negative ads, and suggested he'd like its ads to focus on Santorum's work against Islamic extremism, he said he has nothing to do with the super PAC's advertising strategy.

"I just send the money in and those guys take care of the ads," he said. On the other hand, he has actively worked to boost the Red, White and Blue Fund's fundraising, telling POLITICO he tried to convince Adelson to support Santorum and also planned to solicit donations from donors linked to the libertarian billionaire industrialist Koch brothers. Their most recent gathering of major donors, held late last month in Indian Wells, Calif. was attended by both Adelson and Friess.

"There isn't a person at the Koch brothers events who would not get a good return on their investment by investing in [Santorum] as president, because of what they believe about the free enterprise system," said Friess.

But, Friess said, he leaves all the super PAC business at the door when he's with Santorum. "All my lawyer tells me is, to avoid any problems, don't even mention the super PAC."

Pressed last week on how he could travel with Friess, given his relationship to the super PAC, Santorum told reporters, "We know what the rules are, and the bottom line is, I don't think it crosses a line whatsoever. He's a friend, he's been a friend for many, many years and has traveled with me in the past before it was a super PAC." When the issue of Friess's work on behalf of the super PAC came up again a couple days later, Santorum

asserted, "I have no idea what Foster Friess is doing to my super PAC. That's his business."

Yet Friess has been privy to sensitive campaign business, including fundraising figures, and a private conversation this month between Santorum and Gingrich, who complained that his positions were distorted by a pair of Santorum campaign ads.

"Newt just came up and said that's not true and it would be great if you could change that," said Friess.

Adelson, meanwhile, this month huddled at his Venetian Hotel in Las Vegas with Gingrich, his campaign staff and other big donors for the finance committee meeting. He also held separate private meetings with Gingrich and Romney. Afterwards, Bloomberg News reported that Adelson intended to cut off the flow of cash to the pro-Gingrich super PAC, Winning Our Future.

Adelson has had no formal role in campaign strategy talks, and he and his wife Miriam Adelson stopped by the finance meeting only long enough to hear Gingrich speak before leaving, said a source close to the couple.

The source dismissed the Bloomberg report, explaining Adelson has not made it known whether he intends to continue contributing to Winning Our Future, and would not be influenced in his decision by pressure from other donors or candidates.

Winning Our Future has gone quiet after spending millions on tough ads criticizing Romney's record at the private equity firm he helmed – an attack Gingrich at first embraced, then backed away from.

The coordination rules make "it much more difficult for the super PAC to do a positive ad for the candidate, since they cannot discuss with the candidate what issues they would like for advertising to address," said Jim Bopp, a leading GOP campaign finance attorney. "It is easier to do a negative ad on the opponent since consistency of message is not as important there," said Bopp, a Romney supporter who has advised the former Massachusetts governor on campaign finance policy.

Bopp's proposal for merged candidate-super PAC fundraising led to the FEC opinion clearing such fundraising, and he suggested he might consider challenging the coordination rules "if I had a client" with a strong case.

"I think the FEC's coordination rules are very strict, more strict than allowed by the First Amendment," said Bopp. Rejecting the allegations that the coordination rules are easily circumvented, Bopp asserted campaigns and super PACs are paying close attention to the letter of the law because "the penalties for violation are very severe" and "an investigation is very onerous and burdensome."

-Juana Summers contributed to this report.

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FEDERAL ELECTION COMMISSION
PUBLIC DISCLOSURE
DIVISION

2011 DEC 28 AM 10:06

Committee Name:

Leaders for Families Super PAC, Inc.

If registered, FEC ID:

Today's Date:

12/23/2011

Federal Election Commission

999 E Street, N.W.

Washington, D.C. 20463

Re: Form 1, Statement of Organization—Unlimited Contributions

To Whom It May Concern:

This committee intends to make independent expenditures, and consistent with the U.S. Court of Appeals for the District of Columbia Circuit decision in *SpeechNow v. FEC*, it therefore intends to raise funds in unlimited amounts. This committee will not use those funds to make contributions, whether direct, in-kind, or via coordinated communications, to federal candidates or committees.

Respectfully submitted,



Treasurer's Name:

Charles Hurley

, Treasurer

11030700936

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ATTORNEYS AT LAW

DEC 28 AM 9:49

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(1946-2007)

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jvanderhulst@bopplaw.com
njohnson@bopplaw.com

December 23, 2011

Federal Election Commission
Reports Analysis Division
999 E Street, NW
Washington, DC 20463

Re: Leaders for Families Super PAC, Inc.

VIA FAX AND COURIER

Dear Sir or Madam:

Please be advised that this firm represents the Leaders for Families Super PAC, Inc. ("Committee"). This letter explains the best efforts made by the Committee to comply with the 24-hour reports required when making independent expenditures exceeding \$1,000 within 20 days of an election.

Leaders for Families Super PAC, Inc. was formed on December 21, 2011. On December 22, 2011, the Committee disseminated an autodial call featuring express advocacy of a federal candidate costing \$5,447.25. On December 23, 2011, the Committee also placed a buy for a radio ad to be broadcast starting December 27, 2011, featuring express advocacy of a federal candidate, which will cost \$8,945.00. These communications were and will be publicized in Iowa and refer to the presidential caucus there, which takes place on January 3, 2011. Therefore, the group triggered political committee status on December 22, 2011, 11 CFR § 100.5(a) and has ten days to file its statement of organization (Form 1) with the Commission. Form 1 must be paper filed with an original signature and so the Committee has not yet filed it. But these same communications trigger 24-hour independent expenditure reports by a political committee, 11 CFR § 104.4(f), which must be filed on Schedule E of Form 3X. Because of the amount of the expenditures, however, the Committee is required to electronically file under 11 CFR § 104.18(a)(3)(B)(ii). Yet, because the Committee has not filed, and is not yet required to file its Form 1, it does not have and cannot obtain an FEC ID number and electronic filing password within 24 hours. Therefore, although it is technically an "electronic filer," it is impossible for the

11030700937

Federal Election Commission
December 23, 2011
Page 2

Committee to file electronic reports. Furthermore, there is no provision for filing Schedule E through the FEC's online program.

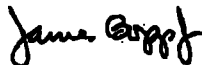
In reliance upon a telephone conversation with Ms. Ashley Carter with the Reports Analysis Division on December 23, 2011, the Committee has decided to send a paper copy of its Form 1 and Schedules E for the recent independent expenditures with original signatures by overnight courier to the FEC. The Committee initially intended and made all efforts for these to arrive on December 24, 2011, but this was impossible due to the restricted pickup operations of both mail and courier services around the Christmas holidays. Accordingly, Form 1 and Schedules E will be overnighted on Tuesday, December 27, 2011. The Committee will then request an ID number and password for electronic filing as soon as possible.

In addition, in reliance upon 11 CFR § 100.20(d)(3) and the instructions for Schedule E, the Committee is also faxing its Schedules E today, December 23, 2011. This should satisfy the regulations for permissible means of filing 24-hour reports by a political committee. The Committee cannot be required to file electronically because it is impossible for it to do so because it cannot obtain a FEC ID number and password from the Commission within 24 hours. Therefore, the 24-hour reports for the independent expenditures made on December 22 and December 23 should be considered timely filed.

Please contact us if you have any questions. Thank you.

Sincerely,

THE BOPP LAW FIRM



James Bopp, Jr.
Joseph A. Vanderhulst

11030700938

FEC
FORM 1

STATEMENT OF
ORGANIZATION

RECEIVED

2011 DEC 28 AM 9:49

Office Use Only
FEC MAIL CENTER

1. NAME OF
COMMITTEE (In full)

☐

(Check if name
is changed)

Example: If typing, type
over the lines.

12FE4M5

Leaders for Families Super PAC, Inc.

ADDRESS (number and street)

1 S. 6th St.

☐

(Check if address
is changed)

Terre Haute

IN

47807

3510

CITY

STATE

ZIP CODE

COMMITTEE'S E-MAIL ADDRESS (Please provide only one e-mail address)

☐

(Check if address
is changed)

hurley4god@gmail.com

COMMITTEE'S WEB PAGE ADDRESS (URL)

☐

(Check if address
is changed)

2. DATE 12 ' 23 ' 2011

3. FEC IDENTIFICATION NUMBER

C

4. IS THIS STATEMENT

☒

NEW (N)

OR

☐

AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Charles Hurley

Signature of Treasurer

Charles Hurley

Date

12 ' 23 ' 2011

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office
Use
Only

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-694-1100

FEC FORM 1
(Revised 02/2009)

Candidate Committee:

- Name of
Candidates**

**Office
Sought:**

House

Senate

President

Stato

District

- Name of Candidate

(d) ☐ This committee is a (National, State or subordinate) committee of the (Democratic, Republican, etc.) Party.

Corporation

☐ Corporation w/o Capital Stock

Labor Organization

Membership Organization

Trade Association

Cooperative

☐ In addition, this committee is a Lobbyist/Registrant PAC.

- ☐ In addition, this committee is a Lobbyist/Registrant PAC.

☐ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

(g) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.

- (h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

FEC ID number

2

FEC ID number C

[illegible][illegible]

15044382004

11030700940

Leaders for Families Super PAC, Inc.

[illegible][illegible]**ZIP CODE**

Telephone number 515 - 238 - 9167

Full Name of
Designated
Agent

Mailing Address

Title or Position

Telephone number

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

First Financial Bank

Mailing Address

PO Box 2122

Terre Haute

IN

47802

CITY

STATE

ZIP CODE

Name of Bank, Depository, etc.

Mailing Address

CITY

STATE

ZIP CODE

11030700942

11030709943

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<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input checked="" type="checkbox"/> Overnight Delivery Service (Specify): <i>fedex</i>	Shipping Date <i>12/27/11</i>
Next Business Day Delivery <input checked="" type="checkbox"/>	
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
<i>Chp</i> PREPARER (3/2005)	<i>12/28/11</i> DATE PREPARED

Iowa Conservative Leader Mired in Controversy After Rick Santorum Endorsement

December 23, 2011
By ABC NEWS

ABC News' Shushannah Walshe and Michael Falcone report:

DAVENPORT, Iowa - An Iowa Christian conservative leader who bestowed his highly sought-after endorsement on presidential candidate Rick Santorum this week is now at the center of a controversy over whether he asked for cash in exchange for his public support.

Less than 48-hours after receiving the backing of Bob Vander Plaats, the head of the prominent evangelical group The Family Leader, Santorum disclosed that the prominent Iowan told him he needed money to make the most out of the endorsement.

And sources familiar with talks between the conservative heavyweight and representatives from several of the Republican presidential campaigns went a step further, describing Vander Plaats' tactics as corrupt.

"Clearly the endorsement was for sale - without a doubt," one source said.

It's a charge that The Family Leader flatly denied.

"The allegation by an unnamed source that Bob Vander Plaats asked any campaigns for money in exchange for his endorsement is absolutely false," according to a statement issued by the organization on Thursday. The Family Leader said Vander Plaats was unavailable for an interview Thursday.

But even Santorum acknowledged in an interview with CNN that money was among the topics he and Vander Plaats discussed last weekend ahead of Tuesday's endorsement press conference.

"What he talked about was he needed money to promote the endorsement and that that would be important to do that," Santorum told CNN. "There was never a direct ask for me to go out and raise money for it."

The former Pennsylvania senator's statement differs from what he told ABC News on Monday night - just hours before Vander Plaats endorsed him. At a campaign event in

Indianola, Iowa, Santorum said the issue of money never came up in his conversations with the Christian leader.

In a statement Santorum's National Communications Director Hogan Gidley said, "I don't know about the discussions other campaigns had, but we did not, nor would we ever agree to raise a single penny for another entity. We're focused on our own campaign and that's where our resources will be spent."

Though Santorum did not specify the dollar amount he and Vander Plaats discussed, multiple sources said he was soliciting as much as \$1 million from Santorum and other candidates.

In an interview with the Des Moines Register this week, Vander Plaats said that it was his "ethical responsibility" to essentially put some money where his mouth is.

"You can't say, 'We endorsed you. Now see you later,'" Vander Plaats told the Iowa newspaper. "That's not going to do a lot in the long run."

But one long-time Iowa conservative activist told ABC News, "There is no way he could buy enough ad space in Iowa for a million dollars - couldn't buy that much advertising in a week and a half in Iowa."

ABC News has learned that Vander Plaats tried to solicit money for his endorsement during the last presidential cycle too. A former staffer for Mitt Romney's 2008 presidential bid who is currently unaffiliated with a campaign said Vander Plaats came to them seeking money for his backing if he supported the former Massachusetts governor.

"He wanted to be paid," the former staffer said. "He was clearly looking for a paycheck. There was a conversation about him getting a title, but being a paid consultant was much more important."

The aide said they offered him a title, but never seriously considered paying Vander Plaats. He ended up endorsing Former Arkansas Gov. Mike Huckabee over Romney.

Unlike four years ago, when members of Iowa's evangelical community helped then-candidate Huckabee to a first place finish in the caucuses, no candidate appears to be drawing the same kind of support from the important group of voters.

A well-known conservative figure in the state that ran unsuccessfully for governor in 2010, Vander Plaats' endorsement had been seen as a key indicator of social conservative sentiment.

At a press conference in Urbandale, Iowa on Tuesday, Vander Plaats called Santorum, "the Huckabee in this race."

"I saw him as a champion for the family in the U.S. House, I saw him as a champion for the family in the U.S. Senate. I saw him as a champion for the family on the campaign trail," he said. "I believe Rick Santorum comes from us, just not to us, he comes from us."

Though Thursday's statement from The Family Leader noted the group's board was "was unanimous in their personal support for Rick Santorum," there was no organization-wide endorsement. Instead, Vander Plaats and another Family Leader official Chuck Hurly, both publicly backed Santorum.

But Vander Plaats tried to exert his influence in other ways, suggesting to Michele Bachmann combine forces with another candidate in order to make it easier for social conservatives to rally behind one candidate ahead of Iowa's Jan. 3 caucuses.

"After much prayer and discernment, The Family Leader board members directed Bob to contact Rick Perry, Michele Bachmann, and Rick Santorum to present the concept of merging in order to provide a solution to the fractured vote of caucus-going conservatives," according to the group's statement. "At no time did Mr. Vander Plaats make any specific demands in regard to who should merge with whom."

Bachmann did not take him up on the offer. She has separately won the backing of the former head of The Family Leader as well as more than 100 Iowa pastors.

ABC's Arlette Saenz contributed to this report.

NBC NEWS

Major Super PAC donor's public role with Santorum campaign

Thursday Feb 9, 2012 8:36 AM

By NBC's Andrew Rafferty

When Rick Santorum took the stage to deliver his victory speech in Missouri on Tuesday, he was flanked to his right by his daughter and to his left by his wife.

Yet just over his shoulder stood the billionaire whose financial support has helped keep the campaign afloat, even in its darkest days.

Foster Friess, the primary funder for the pro-Santorum Super PAC "Red, White and Blue Fund," travels with the inner circle of the campaign; he has given suggestions to advisers about media strategy; and on Friday, he will introduce the presidential hopeful at the Conservative Political Action Conference. The relationship between Friess and the campaign he supports is one of the clearest examples of how candidates are pushing the limits of the only rule governing their relationship with Super PACs -- no coordination.

Laws prohibit candidates and the Super PAC supporting them to discuss things like how to spend money or campaign strategy. But where the line is drawn between being an outside supporter and being an actual part of the campaign has become increasingly blurry as the 2012 presidential cycle has continued.

Santorum is not the only candidate pushing the limits. Newt Gingrich met with his Super PAC funder Sheldon Adelson in Las Vegas ahead of the Nevada caucus earlier this month. Mitt Romney has appeared at fundraisers for "Restore Our Future," the Super PAC supporting his candidacy. And earlier this week, the Obama campaign announced that top advisers and even cabinet secretaries would appear at events for a pro-Obama Super PAC.

But no one else this campaign season has been as public as Santorum about his very close relationship between the campaign and the wealthy supporter helping to finance his Super PAC.

The New York Times reported that Friess, as of Dec. 31, had given the Red, White, and Blue Fund \$331,000 -- more than 40% of all of its financing.

"I'm very, very fastidious about conversations I've had with him. Foster's been a friend for years and years and years and continues to be a friend. We don't talk about any activity of the Super PAC at all," Santorum said last week in Montrose, Colo. after a rally where Friess cheered him from a front row seat. "I have no idea about what he's doing or how much he's giving and I don't

want to know. We talk about family. We talk about other activities. He's very careful in that regard and so am I."

Santorum staffers point to their openness about Friess' involvement as proof they are doing nothing wrong. He is a visible presence on the campaign trail and has done an increasing number of television interviews coinciding with Santorum's resurgence.

But it is that openness that has caused some observers to scratch their heads and make the case that there really are no rules separating campaigns and Super PAC donors. In front of reporters this week, Friess questioned campaign staffers about why the candidate had not done a local interview he tried pitching them on.

"If you want us to do it, we'll do it," one aide finally told him.

The former Pennsylvania senator's spike in popularity after winning races in Missouri, Minnesota, and Colorado has brought with it a renewed interest in the campaign and the role of the Wyoming billionaire. It was during an appearance on CNN the morning after his three state victory where Santorum faced a question about Friess' presence on stage with him the night before.

"Foster Freiss doesn't run my Super PAC. He may be a donor to it, but the people who personally runs my Super PAC, I haven't spoken with in about five months. So, no, I mean, as far as the conversations we have, Foster has been a long personal friend for 20 years," said Santorum.

"And we have spent a lot of time together," he added. "But we also know what the law is and Foster doesn't run the Super PAC and we don't talk about anything regarding those matters. So he's someone, again, who is a friend and will continue to be a good friend."

The response marks a shift in Santorum's defense of Friess. Previously, he described him as nothing more than a friend with whom he converses about anything but campaign matters. Yet now, the candidate says that Friess simply does not run "Red, White and Blue Fund" -- so having him so close to the campaign is no legal issue at all.

"Basically, our lawyers have told us that it's very, very simple. You just don't talk about the Super PAC," Friess said Wednesday on CNN, defending his looming presence on the trail.

And for Friess, the idea that he is pulling the strings of a presidential campaign is laughable to him.

"I have so little control over the Super PAC; all I did was write a check. In fact, Newt came up to me the other day and made some remark about one of the ads. And I said, 'You know, I don't see the ads.'"

"So I'm not the hands on guy, I like writing the check and then I turn it over to the guys who make it happen."

THE NEWS RECORD

Iowa caucus result more than suspicious



Joe Burbank

2012 Republican presidential candidate Ron Paul addresses the Conservative Political Action Conference (CPAC) at the Orange County Convention Center in Orlando, Florida, Friday, September 23, 2011.

Posted: Thursday, January 26, 2012 12:00 am | Updated: 12:35 pm, Wed Aug 29, 2012.

Iowa caucus result more than suspicious Adam Croxton | 0 comments

There are several mysterious happenings, perhaps coincidental, surrounding the Iowa Caucus.

The first oddity is the fact that the Iowa GOP decided to move the final vote-count to an "undisclosed location", due to "an apparent threat from a notorious collective of computer hackers" — a claim that was dubious, at best.

As if vote counting behind closed doors didn't seem suspect enough, there were even more anomalies that continue to be ignored by the mainstream media.

Another change in the normal Iowa Caucus is shown in the new rules created, allowing caucus-goers to vote and register without a photo ID. For a party that consistently pushes legislation to avoid voter fraud, the Iowa GOP Caucus seemed like an exception.

Another sign of corruption is the report of the social conservative bigwig, Bob Vander Plaats, reportedly requesting \$1 million from candidate Rick Santorum to garner support.

In a CNN interview, Santorum stated: "What [Vander Plaats] talked about was he needed money to promote the endorsement and that would be important to do that [...] No one asked me to go out and raise money for it."

In a contradicting statement, Santorum's national communications director, Hogan Gidley said: "[...] we did not, nor would we ever agree to raise a single penny for another entity."

However, the rise in support for Santorum coincided with the time this all took place, leaving many to wonder if Santorum did, in fact, buy support.

To see how the political process really works, and how far from a democratic process it actually is, one need only look to the radio interview by Republican strategist Dee Dee Benkie leading up to the Iowa Caucus.

The host asks: "Is it possible that the party apparatus here could be silently asking those District Chairmen to start swaying some important caucus members over to the anti-Paul side which may end up being Santorum? Do you see a scenario like that happening?"

To which Benkie replied: "I've talked to the party officials; I know they're concerned about it [...] Ron Paul doesn't do us any good in Iowa, doesn't do the country any good, will never get there, so let's figure out what we need to do."

She goes on to further state that, "I kind of think they're going to keep [Paul] from getting the No. 1 spot because they are concerned."

With votes being certified behind closed doors, and this fear from the GOP establishment of a Ron Paul win, it is interesting to note that the chairman of Iowa's Republican Party Matt Strawn, as summarized by CNN: "In some cases, Strawn said, inaccurate numbers were submitted on caucus night but corrected during the certification process."

This begs the question: were the numbers wrong, or was it that the numbers went to a candidate that he considered wrong?

Since the certification was done behind closed doors, we may never know the answer.

There are still eight precincts that haven't been, and probably won't ever be, certified. These precincts are one each in Cerro Gordo, Emmet, Franklin and Pocahontas Counties, and four in Lee County.

What is even more interesting to note is that there were many precincts that were certified, regardless of the fact that they did not have the vote tally on the correct form which the official results were to be put on, the correct number of signatures, or signatures from the correct people.

Between "computer glitches", human error, rumored corruption and missing precinct votes, it is truly a wonder that people think elections are fair — especially in caucuses.

The political party establishment runs caucuses by their own rules and regulations, whereas the state government runs primaries.

To put it mildly, if the GOP establishment wants to find ways to manipulate the result to exclude a candidate, or bolster a candidate, they can, and will.

ABC NEWS

Santorum and His Super Pac: Just Friends, Not Coordination

February 6, 2012

By SHUSHANNAH WALSH

Shushannah Walshe [More from Shushannah »](#)

via WORLD NEWS

GOLDEN, Colo. - The murky rules around super PACs are confusing at best, the only rule being that candidates and their campaigns are not allowed to "coordinate" with the groups raising unlimited funds for their efforts.

And that's about it.

Mitt Romney addresses his own super PAC's fundraisers in person, although he has said he's not allowed to talk to his former staffers that run the group. Newt Gingrich visited last week in Las Vegas with his biggest super PAC donor, Sheldon Adelson, who with his wife has given \$10 million to the former Speaker of the House's effort. And Rick Santorum is traveling with the man largely bankrolling the pro-Santorum super PAC behind the effort to make the former Pennsylvania senator the 2012 GOP nominee: billionaire mutual fund manager, Foster Friess.

Santorum told ABC News that he "know(s) what the rules are" and "I don't think it crosses a line whatsoever."

It does shine a light, however, on the questions around the confusing rules of coordination and the obviously still friendly relationships between people willing to spend tremendous amounts of their own money to support a presidential campaign. And even those rules are hard to enforce.

Friess has been traveling with Santorum for several days. Last Monday in Bemidji, Minn., the 71-year-old bounded around the town with the candidate, wearing a sweater vest to the factory where Santorum's signature look is manufactured and during the tour of the town.

Tuesday he was again on the plane wearing his signature white cowboy hat, as he told jokes to staff and press.

"I don't think it crosses a line whatsoever," Santorum said, when asked if it could look inappropriate and how he prevents lines from being crossed.

"He's a friend who has been a friend for many, many years and has traveled with him in the past even before there was a super PAC and someone who I talk to and who gives me plenty of advice on how I say it and what I say and someone who has been involved in a lot of public

policy issues that I've been involved in for years and again is someone I enjoy their company, but we never even begin to broach the topic of what the super PAC is or does or what he does or does with it," Santorum told reporters after an energy conference here. "That's to me is a completely walled off area."

It's clear advice is given. Monday evening, Friess was questioning staff about interviews the candidate was doing and he compliments Santorum on certain lines he thinks are more powerful than others. Friess first appeared on the trail the night of the Iowa caucuses in January, beaming at his friend's win and introducing himself to reporters covering Santorum's victory (that night it was of a virtual tie, he did not officially win until weeks later). Affable and pleasant to be around, he fits in on the laid back nature of traveling with the Santorum campaign.

Last week, when FEC forms were released, they revealed that Friess gave almost half of the funds to the super PAC supporting Santorum called the Red, White, and Blue Fund. Friess hasn't revealed how much money he's given the fund, but the FEC report said he donated \$331,000, but this is all before Santorum's Iowa win.

In an interview with ABC News over email last week, the mutual fund manager says he will continue "to be supportive in helping raise funds for the Super PAC" and he's encouraged by Santorum's plan to stay in the race for the long haul.

"I think Rick's intention is to go all the way to the convention, about which I'm excited," Friess said.

In Montrose, Colo., Saturday, Friess was also on the trail and Santorum said he is "very fastidious about conversations I've had with him."

"We don't talk about any activity of the super PAC at all," Santorum told reporters. "I have no idea about what he's doing or how much he's giving and I don't want to know. We talk about family. We talk about other activities. He's very careful in that regard and so am I."

President Obama also has a super PAC working for him, although it only raised \$1.3 million in the second half of 2011, according to the most recent Federal Election Commission filing.

The nature of the presidency makes it impossible for Obama to have a similar relationship with super PAC donors, but he has rubbed elbows with some, including Steven Spielberg, at campaign fundraisers.

Spielberg, a major benefactor to Priorities USA, gave \$100,000 in July, according to the FEC.

Friess has said he will travel again with Santorum to this weekend's Conservative Political Action Conference in Washington, DC where Santorum will speak. In fact, Friess is slated to introduce Santorum at the conference.

Notably, Newt Gingrich will be introduced at CPAC by David Bossie, president of Citizens United, the group that helped usher in the super PAC era.

Washington Post

Meet Foster Friess, Rick Santorum's super PAC patron

By Jennifer Rubin

Foster Friess (pronounced "freeze"), the person and not the ice cream franchise, was not a household name before December 25, 2011. Then Rick Santorum shot up from 5 percent in the Iowa polls and eventually went on to win the caucuses. As a result, his longtime friend and major superPAC donor became a bit of a celebrity. But unlike a blasé Hollywood newcomer, Friess is plainly having the time of his life. I spoke to him by phone over the weekend.

He jokes that the left-wing blog Daily Kos dubbed him a "billionaire." Friess jokes, "My wife came to me and said, 'Have you been holding out on me?' People asked, 'So what are you — a multimillionaire?' I like to say a billionaire wanna-be." Most people would call him, "really rich." His is a rags-to-riches story not unlike the father of Santorum's chief rival, Mitt Romney. Friess is a first-generation college graduate. He later made his fortune in investment funds. The New York Times reported, "Like donors to rival super PACs, Mr. Friess ranks among the country's leading patrons of Republican and conservative causes. He has given hundreds of thousands of dollars to the Republican Party and candidates in recent years, including to Mr. Santorum's two chief rivals for the presidential nomination, Mr. Romney and Mr. Gingrich, to whom Mr. Friess donated last spring. Late last year, Mr. Friess gave \$100,000 to Gov. Scott Walker of Wisconsin to help fend off a Democratic-led recall effort."

In Santorum's case, he's given through the Red, White and Blue Fund super PAC, which started on a shoe-string and is now flush with cash. Friess says since Santorum's unexpected success, donors have come out of the woodwork. "A guy from Phoenix called and said, 'A lot of my pals are giving to Romney, but I want to help Rick.'" He jokes that with all the support Santorum is getting he could hand the baton over to other fundraisers. But it is evident he's having far too much fun to do that.

Sixteen years ago, Friess heard Santorum deliver a speech. Part way through the remarks, Friess recounts, "I saw the authenticity of the guy." Shortly thereafter Friess held a fundraiser. "He's been bringing in 10 or 15 thousand, and I raised \$85,000 in my home. That was a lot at that stage for him." Friess says that once Santorum left office, the two became closer, playing golf and spending more time together.

Unlike many superPAC donors and ordinary big GOP donors, Friess hasn't remained in the shadows. In fact, he introduced Santorum for his CPAC speech, an indication of how close the two are. He tells me, "I can't remember who asked [me to speak]. I've often introduced him. I introduced him last year." But Friess dismisses the notion he's now scripted by the campaign. "They had no idea what I'd say," he says.

Friess and Santorum continue to spend time together. At CPAC, Friess was one of only a few advisers with Santorum in the suite during my interview. And he was there from the start. He recalls he spent two days in Iowa with Santorum traveling around in a Dodge truck. "At one point we had to drive four hours to get someplace. "We joked, 'Hey Mitt's probably flying over us in a jet.'" But he witnessed firsthand the intensity of interest in Santorum's campaign.

He's seen Santorum over a long span of time, debated politics with him and observed him up close in family settings. Friess is candid, "He was known in the House as very courageous but prickly." He points to the Gang of Seven effort that uncovered the banking scandal. "He took on much more senior colleagues." But Friess insists there has been a maturation process.

For weeks pundits chattered about a "new" Newt Gingrich. But Friess implicitly suggests there is a new Rick. Since the days in the House, Santorum, he says, "has been able to migrate into more joyfulness, although he is still combative." Outside observers haven't always seen that, and in early debates Santorum was criticized for seeming too intense or even angry. But Friess says that beginning in the Senate, Santorum changed. "All of us grow," Friess says. "He migrated to be more conservative." Friess attributes that to the "aging of experience and the faith journey" Santorum became more religious during that time, Friess recalls, in large part as a result of his Bible study classes.

He resisted the notion that Santorum was a big-spender in Congress. "Everyone in Congress, except for maybe Ron Paul and [Sen. John] McCain, have [voted] for earmarks." He likes to say, "Rick is in recovery" from earmarks.

In a campaign in which the base seems to be searching for perfection, Friess cautions, "You're not going to agree with him on everything. Hey, if you were looking for a perfect match, you'd never get married." He declines to say on what topics he and Santorum disagree, but he paints a portrait of a candidate stalwart in his views. Santorum's critics label this as "stubborn" or "strident," but Friess sees things differently. "You might not agree with him, but you admire his integrity."

Santorum has the advantage, but also the burden, of lacking a cadre of advisers, speechwriters and consultants. Early on, Santorum had no money for these hangers-on; now he seems to delight in talking about whatever he wants to and sticking to his convictions. Friess argues that this is "why Rick resonates." As time goes on, however, Santorum may be hurt by some constructive advice. In New Hampshire for example, he engaged in wide-ranging town hall discussions with voters (arguing about gay rights, for example) which may have taken him off his populist economic message and contributed to his fourth place finish.

Santorum is not the sort of candidate who gathers policy advisers around to brainstorm or who goes through multiple speech drafts. He is the policy director and the speechwriter for the campaign. Friess says, "In Missouri we were all standing in the hall. Rick had two pages of notes. We were chatting; he was scribbling." A few minutes later Santorum took to the stage to give his victory speech. Friess says Santorum "has the ability to think through things and not get distracted." That focus has come in handy, but as the campaign grows larger, and certainly in the White House, Santorum would find it impossible to be a one-man band. (The Romney team

characterizes Santorum as lacking executive experience and the sort of managerial authority needed to be an effective president:)

Friess has certainly become a believer in the Santorum message. He explains the theme of the CPAC speech: "Do you want to be ruled by rules and regulations or guided by principles and virtues." The contrast between a "top-down" and a "bottom-up" society is a common message in Santorum's speeches.

Friess is also more candid than a candidate. He says when he talked about wealthy people "self-taxing" he got some flak. But he says, "Even Romney, when you look at what he contributes [combined taxes and charity], gives about 40 percent of his income. What if I want to provide day care? I can spend my money or the government can tax me and then provide [the day care]." He says it is a matter of "how you want to help people."

Friess finds it "stunning" that he is now in the limelight. He says he knows "people at my country club" and in Wyoming and Delaware (where he began his career), but he's never been a public figure.

He recalls that he ran into trouble with a Reuters report that recounted:

Friess had no hesitation in bringing the Mormon Church, of which the Republican front-runner Mitt Romney is a member, into an attack on abuse of welfare benefits, suggesting, without explanation, that "little Mormon gals" were getting pregnant with rich men and taking welfare to pay for their babies.

He seemed to be saying this was as much a factor in the breakdown of society than a spin-off of Mormonism: "It's not just because they are in the Mormon Church. It's what has happened in America where typically Mormons would never ever take welfare — ever."

Other candidates and their backers have generally avoided overt attacks on Mormonism, aware of the risk of trespassing on the widely respected right to freedom of religious belief.

Friess insists his statements weren't anti-Mormon. But certainly, that was a lesson in the rough and tumble of presidential politics. Aside from that incident, however, he confesses that the press has been "so polite and kind." Well, that may change if, as he hopes, Santorum gets the nomination.

For now, however, there is a "Gee, can you believe it?" quality to both Friess and the man whose campaign he's generously funded. The left may not find it so endearing, but only in America could a "billionaire wanna-be" and a long-shot candidate, who is often mocked for his faith, team up to compete for the presidency. They may not win, but they are certainly enjoying the ride.

By Jennifer Rubin | 08:30 AM ET, 02/13/2012

Image# 12950395222

PAGE 1 / 18

**FEC
FORM 3X****REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

RED WHITE AND BLUE FUND

ADDRESS (number and street)

PO BOX 26141

Check if different
than previously
reported. (ACC)

ALEXANDRIA

VA

22313

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C C00503417

3. IS THIS REPORT X NEW OR AMENDED (A)

4. TYPE OF REPORT
(Choose One)

(a) Quarterly Reports:

April 15
Quarterly Report (Q1)July 15
Quarterly Report (Q2)October 15
Quarterly Report (Q3)X January 31
Year-End Report (YE)July 31 Mid-Year
Report (Non-election
Year Only) (MY)Termination Report
(TER)(b) Monthly
Report
Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

Nov 20 (M11)
(Non-Election
Year Only)

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

Dec 20 (M12)
(Non-Election
Year Only)

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(c) 12-Day
PRE-Election
Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

in the
State of(d) 30-Day
POST-Election
Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the
State of

5. Covering Period

M M / D D / Y Y Y Y
10 01 2011

through

M M / D D / Y Y Y Y
12 31 2011

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Mr. Christopher M Marston

Signature of Treasurer

Mr. Christopher M Marston

[Electronically Filed]

Date

M M / D D / Y Y Y Y
01 31 2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office
Use
Only**FEC FORM 3X**
Rev. 12/2004

FE6AN028

SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

RED WHITE AND BLUE FUND

Report Covering the Period:

From:

10 01 2011

To:

12 31 2011

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2011		0.00
(b) Cash on Hand at Beginning of Reporting Period.....	0.00	
(c) Total Receipts (from Line 19)	729935.00	729935.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	729935.00	729935.00
7. Total Disbursements (from Line 31)	651820.89	651820.89
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	78114.11	78114.11
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

RED WHITE AND BLUE FUND

Report Covering the Period: From: 10 / 01 / 2011 To: 12 / 31 / 2011

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	729000.00	729000.00
(ii) Unitemized	935.00	935.00
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	729935.00	729935.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	729935.00	729935.00
12. Transfers From Affiliated/Other Party Committees.....	0.00	0.00
13. All Loans Received.....	0.00	0.00
14. Loan Repayments Received.....	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0.00	0.00
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.).....	0.00	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0.00	0.00
(b) Levin Funds (from Schedule H5)	0.00	0.00
(c) Total Transfers (add 18(a) and 18(b))..	0.00	0.00
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	729935.00	729935.00
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	729935.00	729935.00

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

III. Net Contributions/Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	729935.00	729935.00
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	729935.00	729935.00
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	3140.89	3140.89
37. Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)	3140.89	3140.89

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

FOR LINE NUMBER: PAGE 6 OF 18

(check only one)

☒ 11a ☐ 11b ☐ 11c ☐ 12
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

 NAME OF COMMITTEE (In Full)
RED WHITE AND BLUE FUND

Full Name (Last, First, Middle Initial)

A. Susan Arnall

Mailing Address 1126 Geneva St

 City State Zip Code
 Glendale CA 91207

 FEC ID number of contributing
 federal political committee. **C**

 Name of Employer Occupation
 Self Homemaker

 Receipt For: Aggregate Year-to-Date ▼
☐ Primary ☐ General
☐ Other (specify) ▼ 250.00

Date of Receipt

12 28 2011

Transaction ID: SA11AI.4223

Amount of Each Receipt this Period

250.00

Full Name (Last, First, Middle Initial)

B. Arrabon Management Services, LLCMailing Address 401 Wilshire Blvd
Ste 1070
 City State Zip Code
 Santa Monica CA 90401-1428

 FEC ID number of contributing
 federal political committee. **C**

Name of Employer Occupation

 Receipt For: Aggregate Year-to-Date ▼
☐ Primary ☐ General
☐ Other (specify) ▼ 15000.00

Date of Receipt

12 22 2011

Transaction ID: SA11AI.4145

Amount of Each Receipt this Period

15000.00

Attribution Memo Entry Follows

Full Name (Last, First, Middle Initial)

C. David SegeMailing Address 401 Wilshire Blvd
Ste 1070
 City State Zip Code
 Santa Monica CA 90401-1428

 FEC ID number of contributing
 federal political committee. **C**

 Name of Employer Occupation
 Arrabon Managment Services Executive

 Receipt For: Aggregate Year-to-Date ▼
☐ Primary ☐ General
☐ Other (specify) ▼ 15000.00

Date of Receipt

12 22 2011

Transaction ID: SA11AI.4145.0

Amount of Each Receipt this Period

15000.00

[MEMO ITEM]

SUBTOTAL of Receipts This Page (optional)..... 15250.00

TOTAL This Period (last page this line number only).....

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTSUse separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 7 OF 18

(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 17
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

RED WHITE AND BLUE FUND

A. Jeffrey Francis Bullock Full Name (Last, First, Middle Initial) Mailing Address 1760 Overview Ct City Dubuque State IA Zip Code 52003 FEC ID number of contributing federal political committee. C Name of Employer University of Dubuque Occupation President Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼ Aggregate Year-to-Date ▼ 250.00			Date of Receipt 12 28 2011 Transaction ID : SA11A1.4211 Amount of Each Receipt this Period , , 250.00
B. Leslie P Edelman Full Name (Last, First, Middle Initial) Mailing Address 555 Taxter Rd Ste 235 City Elmsford State NY Zip Code 10523 FEC ID number of contributing federal political committee. C Name of Employer Kimber Manufacturing, Inc. Occupation Owner Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼ Aggregate Year-to-Date ▼ 10000.00			Date of Receipt 12 27 2011 Transaction ID : SA11A1.4164 Amount of Each Receipt this Period , , 10000.00
C. Foster S Friess Full Name (Last, First, Middle Initial) Mailing Address 115 E Snow King Ave PO Box 9790 City Jackson State WY Zip Code 83002 FEC ID number of contributing federal political committee. C Name of Employer Self Occupation Investor Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼ Aggregate Year-to-Date ▼ 250000.00			Date of Receipt 11 03 2011 Transaction ID : SA11A1.4107 Amount of Each Receipt this Period , , 250000.00
SUBTOTAL of Receipts This Page (optional).....▶			, , 260250.00
TOTAL This Period (last page this line number only).....▶			, ,

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 8 OF 18

(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17
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Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
RED WHITE AND BLUE FUND

Full Name (Last, First, Middle Initial) A. Foster S Friess		Date of Receipt 12 22 2011
Mailing Address 115 E Snow King Ave PO Box 9790		Transaction ID : SA11AI.4144
City Jackson	State WY	Zip Code 83002
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 81000.00
Name of Employer Self	Occupation Investor	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 331000.00	
Full Name (Last, First, Middle Initial) B. FSH Capital LLC		Date of Receipt 12 29 2011
Mailing Address PO Box 50401		Transaction ID : SA11AI.4170
City Henderson	State NV	Zip Code 89016
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 20000.00
Name of Employer	Occupation	Attribution Memo Entry Follows
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 20000.00	
Full Name (Last, First, Middle Initial) C. Frank Hanna		Date of Receipt 12 29 2011
Mailing Address PO Box 50401		Transaction ID : SA11AI.4170.0
City Henderson	State NV	Zip Code 89016
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 20000.00
Name of Employer FSH Capital LLC	Occupation Executive	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 20000.00	[MEMO ITEM]
SUBTOTAL of Receipts This Page (optional).....▶		101000.00
TOTAL This Period (last page this line number only).....▶		

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 9 OF 18

(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17
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Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
RED WHITE AND BLUE FUND

Full Name (Last, First, Middle Initial) A. David L Hollinger			Date of Receipt 12 29 2011	
Mailing Address 755 White Oak Rd			Transaction ID: SA11AI.4174	
City Denver	State PA	Zip Code 17517	Amount of Each Receipt this Period 10000.00	
FEC ID number of contributing federal political committee. C				
Name of Employer Four Seasons Produce Inc		Occupation Executive		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 10000.00		
Full Name (Last, First, Middle Initial) B. Arnold Martin Katz			Date of Receipt 12 21 2011	
Mailing Address 1270 round hill road			Transaction ID: SA11AI.4191	
City Bryn Mawr	State PA	Zip Code 19010	Amount of Each Receipt this Period 10000.00	
FEC ID number of contributing federal political committee. C				
Name of Employer Self		Occupation Insurance		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 10000.00		
Full Name (Last, First, Middle Initial) C. Keith Loiselle			Date of Receipt 11 10 2011	
Mailing Address 180 Wedgewood Dr			Transaction ID: SA11AI.4103	
City Gibsonia	State PA	Zip Code 15044-9794	Amount of Each Receipt this Period 9000.00	
FEC ID number of contributing federal political committee. C				
Name of Employer CDL Medical		Occupation Executive		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 9000.00		
SUBTOTAL of Receipts This Page (optional).....			29000.00	
TOTAL This Period (last page this line number only).....				

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

FOR LINE NUMBER: PAGE 10 OF 18

(check only one)

☒ 11a ☐ 11b ☐ 11c ☐ 12
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17

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NAME OF COMMITTEE (In Full)

RED WHITE AND BLUE FUND

A. Keith Loiselle Full Name (Last, First, Middle Initial) Mailing Address 180 Wedgewood Dr City Gibsonia State PA Zip Code 15044-9794 FEC ID number of contributing federal political committee. C Name of Employer CDL Medical Occupation Executive Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) T Aggregate Year-to-Date T 18500.00			Date of Receipt 11 10 2011 Transaction ID : SA11AI.4105 Amount of Each Receipt this Period 9500.00
B. Keith Loiselle Full Name (Last, First, Middle Initial) Mailing Address 180 Wedgewood Dr City Gibsonia State PA Zip Code 15044-9794 FEC ID number of contributing federal political committee. C Name of Employer CDL Medical Occupation Executive Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) T Aggregate Year-to-Date T 25000.00			Date of Receipt 11 14 2011 Transaction ID : SA11AI.4106 Amount of Each Receipt this Period 6500.00
C. Steven G Mihaylo Full Name (Last, First, Middle Initial) Mailing Address PO Box 19790 City Reno State NV Zip Code 89511 FEC ID number of contributing federal political committee. C Name of Employer (Mergent, Inc. Occupation Executive Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) T Aggregate Year-to-Date T 25000.00			Date of Receipt 12 16 2011 Transaction ID : SA11AI.4125 Amount of Each Receipt this Period 25000.00
SUBTOTAL of Receipts This Page (optional).....			41000.00
TOTAL This Period (last page this line number only).....			

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 11 OF 18

(check only one)

☒ 11a ☐ 11b ☐ 11c ☐ 12
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
RED WHITE AND BLUE FUND

A. Joe Murphy Full Name (Last, First, Middle Initial) Mailing Address 519 Blackjack Oak City State Zip Code Shavano Park TX 78230 FEC ID number of contributing federal political committee. C Name of Employer Occupation Murphy Tomatoes Sales Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) T Aggregate Year-to-Date T 5000.00			Date of Receipt 12 19 2011 Transaction ID: SA11AI.4127 Amount of Each Receipt this Period 5000.00
B. Charles Parlato Full Name (Last, First, Middle Initial) Mailing Address 1144 Old White Plains Rd City State Zip Code Mamaroneck NY 10543 FEC ID number of contributing federal political committee. C Name of Employer Occupation C&C Shorelands Inc Developer Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) T Aggregate Year-to-Date T 25000.00			Date of Receipt 12 22 2011 Transaction ID: SA11AI.4142 Amount of Each Receipt this Period 25000.00
C. Nicholas Ryan Full Name (Last, First, Middle Initial) Mailing Address 400 Locust Street Suite 330 City State Zip Code Des Moines IA 50309 FEC ID number of contributing federal political committee. C Name of Employer Occupation Self Entrepreneur Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) T Aggregate Year-to-Date T 2525.00			Date of Receipt 12 20 2011 Transaction ID: SA11AI.4189 Amount of Each Receipt this Period 2500.00
SUBTOTAL of Receipts This Page (optional).....			32500.00
TOTAL This Period (last page this line number only).....			

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

FOR LINE NUMBER: PAGE 12 OF 18

(check only one)

☒ 11a ☐ 11b ☐ 11c ☐ 12
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

RED WHITE AND BLUE FUND

Full Name (Last, First, Middle Initial) A. Dr John M Templeton Jr			Date of Receipt 12 14 2011 Transaction ID : SA11AI.4109		
Mailing Address 601 Pembroke Rd					
City	State	Zip Code			
Bryn Mawr	PA	19010			
FEC ID number of contributing federal political committee. C			Amount of Each Receipt this Period 50000.00		
Name of Employer John Templeton Foundation		Occupation Executive			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) T		Aggregate Year-to-Date T 50000.00			
Full Name (Last, First, Middle Initial) B. Dr John M Templeton Jr			Date of Receipt 12 23 2011 Transaction ID : SA11AI.4151		
Mailing Address 601 Pembroke Rd					
City	State	Zip Code			
Bryn Mawr	PA	19010			
FEC ID number of contributing federal political committee. C			Amount of Each Receipt this Period 200000.00		
Name of Employer John Templeton Foundation		Occupation Executive			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) T		Aggregate Year-to-Date T 250000.00			
Full Name (Last, First, Middle Initial) C.			Date of Receipt		
Mailing Address					
City	State	Zip Code			
FEC ID number of contributing federal political committee. C			Amount of Each Receipt this Period		
Name of Employer		Occupation			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) T		Aggregate Year-to-Date T			
SUBTOTAL of Receipts This Page (optional).....			250000.00		
TOTAL This Period (last page this line number only).....			729000.00		

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 13 OF 18

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

RED WHITE AND BLUE FUND

Full Name (Last, First, Middle Initial)

A. Holtzman Vogel PLLC

Date of Disbursement

 Mailing Address 45 N Hill Dr
 Ste 100

12 14 2011

City Warrenton State VA Zip Code 20186

Transaction ID : SB21B.4111

 Purpose of Disbursement
 Legal Services

Amount of Each Disbursement this Period

Candidate Name:

Category/
Type

1168.75

 Office Sought: ☐ House ☐ Senate ☐ President
 Disbursement For: ☐ Primary ☐ General
☐ Other (specify) T

State: District:

Full Name (Last, First, Middle Initial)

B. North Rock Reports, LLC

Date of Disbursement

 Mailing Address 45 N Hill Dr
 Ste 100

12 14 2011

City Warrenton State VA Zip Code 20186

Transaction ID : SB21B.4113

 Purpose of Disbursement
 Compliance Consulting

Amount of Each Disbursement this Period

Candidate Name:

Category/
Type

1000.00

 Office Sought: ☐ House ☐ Senate ☐ President
 Disbursement For: ☐ Primary ☐ General
☐ Other (specify) T

State: District:

Full Name (Last, First, Middle Initial)

C. Piryx, Inc.

Date of Disbursement

Mailing Address 144 2nd St Fl 1

12 31 2011

City San Francisco State CA Zip Code 94105

Transaction ID : SB21B.4242

 Purpose of Disbursement
 Credit Card Processing

Amount of Each Disbursement this Period

Candidate Name:

Category/
Type

852.14

 Office Sought: ☐ House ☐ Senate ☐ President
 Disbursement For: ☐ Primary ☐ General
☐ Other (specify) T

State: District:

SUBTOTAL of Disbursements This Page (optional)..... 3020.89

TOTAL This Period (last page this line number only)..... 3020.89

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 14 OF 18

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

RED WHITE AND BLUE FUND

Full Name (Last, First, Middle Initial)

A. Leaders for Families Super PAC, Inc

Date of Disbursement

12 27 2011

 Mailing Address c/o Bopp Law Firm
 1 S 6th St

City	State	Zip Code
Terre Haute	IN	47807-3510

Purpose of Disbursement
Contribution

Candidate Name

Category/
Type

Transaction ID : SB23.4154

Amount of Each Disbursement this Period

50000.00

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) T

State:

District:

Full Name (Last, First, Middle Initial)

B. Leaders for Families Super PAC, Inc

Date of Disbursement

12 29 2011

 Mailing Address c/o Bopp Law Firm
 1 S 6th St

City	State	Zip Code
Terre Haute	IN	47807-3510

Purpose of Disbursement
Contribution

Candidate Name

Category/
Type

Transaction ID : SB23.4167

Amount of Each Disbursement this Period

25000.00

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) T

State:

District:

Full Name (Last, First, Middle Initial)

C.

Date of Disbursement

Mailing Address

City	State	Zip Code
------	-------	----------

Purpose of Disbursement

Candidate Name

Category/
Type

Amount of Each Disbursement this Period

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) T

State:

District:

SUBTOTAL of Disbursements This Page (optional).....

75000.00

TOTAL This Period (last page this line number only).....

75000.00

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 4

II. Disbursements	COLUMN A Total This Period		COLUMN B Calendar Year-to-Date	
21. Operating Expenditures:				
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)				
(i) Federal Share	0.00		0.00	
(ii) Non-Federal Share.....	0.00		0.00	
(b) Other Federal Operating Expenditures	3140.89		3140.89	
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	3140.89		3140.89	
22. Transfers to Affiliated/Other Party Committees.....	0.00		0.00	
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	75000.00		75000.00	
24. Independent Expenditures (use Schedule E)	573680.00		573680.00	
25. Coordinated Party Expenditures (2 U.S.C. §441a(d)) (use Schedule F).....	0.00		0.00	
26. Loan Repayments Made.....	0.00		0.00	
27. Loans Made.....	0.00		0.00	
28. Refunds of Contributions To:				
(a) Individuals/Persons Other Than Political Committees	0.00		0.00	
(b) Political Party Committees	0.00		0.00	
(c) Other Political Committees (such as PACs).....	0.00		0.00	
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c))	0.00		0.00	
29. Other Disbursements	0.00		0.00	
30. Federal Election Activity (2 U.S.C. §431(20))				
(a) Allocated Federal Election Activity (from Schedule H6)				
(i) Federal Share	0.00		0.00	
(ii) "Levin" Share.....	0.00		0.00	
(b) Federal Election Activity Paid Entirely With Federal Funds	0.00		0.00	
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))	0.00		0.00	
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) ..	651820.89		651820.89	
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....	651820.89		651820.89	

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

 PAGE 15 OF 18
 FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) RED WHITE AND BLUE FUND			FEC IDENTIFICATION NUMBER ▼ C C00503417							
Check if <input type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report <input type="checkbox"/> New report <input type="checkbox"/> Amends report filed on _____										
Full Name (Last, First, Middle Initial) of Payee Abundance Media			Date 12 28 2011							
Mailing Address 2204 Sawgrass Village Dr			Amount 2000.00							
City Ponte Vedra Beach		State FL	Zip Code 32082							
Purpose of Expenditure E-mail Advocacy		Category/ Type	Transaction ID : SE.4168							
Name of Federal Candidate Supported or Opposed by Expenditure: RICHARD J. SANTORUM			Office Sought: <input type="checkbox"/> House <input checked="" type="checkbox"/> Senate <input type="checkbox"/> President Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose							
Calendar Year-To-Date Per Election for Office Sought 344958.00			Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General 2012 <input type="checkbox"/> Other (specify) _____							
Full Name (Last, First, Middle Initial) of Payee GOP Lounge LLC			Date 12 20 2011							
Mailing Address c/o The Iowa Republican PO Box 93931			Amount 450.00							
City Des Moines		State IA	Zip Code 50393							
Purpose of Expenditure Online Advertising		Category/ Type	Transaction ID : SE.4132							
Name of Federal Candidate Supported or Opposed by Expenditure: RICHARD J. SANTORUM			Office Sought: <input type="checkbox"/> House <input checked="" type="checkbox"/> Senate <input type="checkbox"/> President Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose							
Calendar Year-To-Date Per Election for Office Sought 217958.00			Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General 2012 <input type="checkbox"/> Other (specify) _____							
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">(a) SUBTOTAL of Itemized Independent Expenditures.....</td> <td style="width: 40%; text-align: right;">2450.00</td> </tr> <tr> <td>(b) SUBTOTAL of Unitemized Independent Expenditures</td> <td style="text-align: right;">-</td> </tr> <tr> <td>(c) TOTAL Independent Expenditures.....</td> <td style="text-align: right;">-</td> </tr> </table>					(a) SUBTOTAL of Itemized Independent Expenditures.....	2450.00	(b) SUBTOTAL of Unitemized Independent Expenditures	-	(c) TOTAL Independent Expenditures.....	-
(a) SUBTOTAL of Itemized Independent Expenditures.....	2450.00									
(b) SUBTOTAL of Unitemized Independent Expenditures	-									
(c) TOTAL Independent Expenditures.....	-									
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (If the reporting entity is not a political party committee) any political party committee or its agent.										
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 40%;"> Signature <u>Mr. Christopher M Marston</u> _____ </td> <td style="width: 20%; text-align: center;"> [Electronically Filed] </td> <td style="width: 40%; text-align: right;"> Date 01 31 2012 </td> </tr> </table>					Signature <u>Mr. Christopher M Marston</u> _____	[Electronically Filed]	Date 01 31 2012			
Signature <u>Mr. Christopher M Marston</u> _____	[Electronically Filed]	Date 01 31 2012								

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

 PAGE 16 OF 18
 FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) RED WHITE AND BLUE FUND	FEC IDENTIFICATION NUMBER C C00503417
---	---

 Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report filed on

 Full Name (Last, First, Middle Initial) of Payee
SRCP Media, Inc.

Date

12 14 2011

 Mailing Address 201 N Union St
 Ste 200

Amount

200500.00

 City State Zip Code
 Alexandria VA 22314

Transaction ID : SE.4115

 Purpose of Expenditure
 Television Advertising

 Category/
 Type

 Office Sought: ☐ House State: IA
☐ Senate District:
☒ President

 Name of Federal Candidate Supported or Opposed by Expenditure:
 RICHARD J. SANTORUM

 Check One: ☒ Support ☐ Oppose

 Calendar Year-To-Date Per Election
 for Office Sought 200500.00

 Disbursement For: ☒ Primary ☐ General
 2012 ☐ Other (specify)

 Full Name (Last, First, Middle Initial) of Payee
SRCP Media, Inc.

Date

12 14 2011

 Mailing Address 201 N Union St
 Ste 200

Amount

17008.00

 City State Zip Code
 Alexandria VA 22314

Transaction ID : SE.4345

 Purpose of Expenditure
 Advertising Production

 Category/
 Type

 Office Sought: ☐ House State: IA
☐ Senate District: 00
☒ President

 Name of Federal Candidate Supported or Opposed by Expenditure:
 RICHARD J. SANTORUM

 Check One: ☒ Support ☐ Oppose

 Calendar Year-To-Date Per Election
 for Office Sought 217508.00

 Disbursement For: ☒ Primary ☐ General
 2012 ☐ Other (specify)

(a) SUBTOTAL of Itemized Independent Expenditures.....	217508.00
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures.....	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Mr. Christopher M Marston

[Electronically Filed]

Date 01 31 2012

Signature

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

 PAGE 17 OF 18
 FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) RED WHITE AND BLUE FUND	FEC IDENTIFICATION NUMBER ▼ C 00503417
---	--

 Check if ☐ 24-hour report ☐ 48-hour report ☐ New report ☐ Amends report Filed on

 Full Name (Last, First, Middle Initial) of Payee
SRCP Media, Inc.

Date

12 22 2011

 Mailing Address 201 N Union St
 Ste 200

Amount

125000.00

City	State	Zip Code
Alexandria	VA	22314

Transaction ID : SE.4138

 Purpose of Expenditure
 Television Advertising

 Category/
 Type

 Office Sought: ☐ House ☐ Senate ☒ President
 State: IA District:

 Name of Federal Candidate Supported or Opposed by Expenditure:
 RICHARD J. SANTORUM

 Check One: ☒ Support ☐ Oppose

 Calendar Year-To-Date Per Election
 for Office Sought 342958.00

 Disbursement For: ☒ Primary ☐ General
 2012 ☐ Other (specify)

 Full Name (Last, First, Middle Initial) of Payee
SRCP Media, Inc.

Date

12 29 2011

 Mailing Address 201 N Union St
 Ste 200

Amount

200000.00

City	State	Zip Code
Alexandria	VA	22314

Transaction ID : SE.4152

 Purpose of Expenditure
 Television Advertising

 Category/
 Type

 Office Sought: ☐ House ☐ Senate ☒ President
 State: IA District:

 Name of Federal Candidate Supported or Opposed by Expenditure:
 RICHARD J. SANTORUM

 Check One: ☒ Support ☐ Oppose

 Calendar Year-To-Date Per Election
 for Office Sought 544958.00

 Disbursement For: ☒ Primary ☐ General
 2012 ☐ Other (specify)

(a) SUBTOTAL of Itemized Independent Expenditures..... 325000.00

(b) SUBTOTAL of Unitemized Independent Expenditures.....

(c) TOTAL Independent Expenditures.....

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Mr. Christopher M Marston

[Electronically Filed]

Date 01 31 2012

Signature

Full Name (Last, First, Middle Initial) of Payee SRCP Media, Inc.		Date 12 29 2011	
Mailing Address 201 N Union St Ste 200		Amount 9250.00	
City Alexandria	State VA	Zip Code 22314	Transaction ID : SE.4157
Purpose of Expenditure Television Advertising	Category/ Type	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input checked="" type="checkbox"/> President	State: IA District:
Name of Federal Candidate Supported or Opposed by Expenditure: RICHARD J. SANTORUM		Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	
Calendar Year-To-Date Per Election for Office Sought		Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General 2012 <input type="checkbox"/> Other (specify)	554208.00

Full Name (Last, First, Middle Initial) of Payee SRCP Media, Inc.		Date 12 / 29 / 2011	
Mailing Address 201 N Union St Ste 200		Amount 19472.00	
City Alexandria	State VA	Zip Code 22314	Transaction ID : SE 4346
Purpose of Expenditure Advertising Production	Category/ Type	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input checked="" type="checkbox"/> President	State: IA District: 00
Name of Federal Candidate Supported or Opposed by Expenditure: RICHARD J. SANTORUM		Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	
Calendar Year-To-Date Per Election for Office Sought		Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____	
		573680.00	

(a) SUBTOTAL of Itemized Independent Expenditures.....	▶				28722.00
(b) SUBTOTAL of Unitemized Independent Expenditures.....	▶				
(c) TOTAL Independent Expenditures.....	▶				573680.00

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Mr. Christopher M Marston
[Electronically Filed]
Date 01 31 2012
Signature